

BEFORE THE WELLINGTON CITY COUNCIL

In the Matter Of: the Resource Management Act 1991

And

In the Matter Of: an application to re-zone part of the
Kiwipoint Quarry from Open Space B to
Business 2 (Plan Change 83)

STATEMENT OF EVIDENCE

Evidence of: TIM KELLY, Director Tim Kelly Transportation Planning Ltd
Subject Area: Transportation Issues
On Behalf of: Applicant
Date: 19 November 2018

INTRODUCTION

- 1 My name is Tim Kelly. I am a director of my own traffic engineering and transportation planning practice.
- 2 I have worked in the traffic engineering and transportation planning field since 1983. I hold a Bachelor of Arts degree in Geography, and a Master of Science degree in Traffic Engineering and Transportation Planning, both from the University of Sheffield in the United Kingdom.
- 3 I am a full Member of the Chartered Institute of Logistics and Transport, and the IPENZ Transportation Group (a Technical Interest Group of IPENZ).
- 4 My career to date has been spent in the consultancy sector of transportation, in both the United Kingdom and New Zealand. During my career, I have provided policy advice regarding traffic and transportation matters, and undertaken assessments for a wide variety of development proposals across New Zealand.
- 5 This experience includes work on a wide range of projects in the Wellington area.

CODE OF CONDUCT STATEMENT

6 While this is not an Environment Court hearing, I nonetheless confirm that I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the Code and am satisfied that the matters which I address in my evidence are within my field of expertise. I am not aware of any material facts that I have omitted which might alter or detract from the opinions I express in my evidence. I understand that I have an overriding duty to assist the hearing in an impartial manner and that I am not an advocate for the party which has engaged me.

INVOLVEMENT

7 I was approached in July 2018 to review the traffic issues associated with Plan Change 83 (PC83).

8 Prior to this time, it had been considered that PC83 would have no tangible impact upon levels of traffic activity, since the quarry output is effectively constrained by the availability of a single crushing unit on the site.

9 However, a submission from the NZ Transport Agency (NZTA) raised potential concerns regarding safety issues on Ngauranga Gorge associated with the movement of loaded trucks from the quarry.

10 My engagement was in the context of specifically addressing the matters raised by the NZTA. This has involved site visits, a meeting with NZTA representatives (on 31 July 2018) and a detailed analysis of traffic information and crash records. I subsequently prepared a Traffic Assessment report dated August 2018 (**Attachment 1** to this evidence).

11 Since this time, I have reviewed the s42A report of the Consultant Senior Consents Planner for WCC. Finally, I have prepared this statement of evidence.

CONCLUSIONS OF ASSESSMENT

12 I do not intend to repeat the content of my August 2018 report, other than the conclusions, which are:

- slightly over half of the quarry output is supplied to other activities within the Kiwipoint area (Allied Concrete and Downer);
- the number of external quarry-related truck movements should include those

associated with these other facilities and on an average day, these total 210 (split equally between arriving and departing movements);

- northbound between Kiwipoint and the Newlands interchange, the quarry-related truck movements account for under 4% of total heavy vehicle movements;
- vehicular access to and from the Kiwipoint area is of a good standard (especially when compared to the corresponding access to the Tyers Road area to the south);
- a detailed analysis of crash records provides no evidence of any incidents associated with quarry-related truck movements;
- while loaded slow-moving trucks have a potential to cause some disruption to traffic flow, the good standard of forward visibility, room for lane-changing by other drivers and low activity levels during the periods of highest traffic demand means that any effects are minimal;
- occasional problems associated with material spillage to the road surface can be addressed through improved loading and monitoring procedures;
- the plan change will enable existing levels of truck activity to continue over a longer period and will not affect the daily quarry output (which is primarily constrained by the availability of rock crushing equipment and an inability to stockpile material); and
- if the plan change was not approved, the need to source rock materials from other locations would result in an overall increase in truck haulage distances, with some adverse effects upon the efficiency of the wider state highway network.

REPORT OF THE PLANNING OFFICER

13 I have reviewed the report of the Consultant Senior Consents Planner for WCC, Mr Jones, dated 19 November 2018. This includes Appendix 4, an assessment of Transportation Effects, prepared by Council's Chief Advisor Transport & Infrastructure, Mr Spence.

14 The overall recommendation of Mr Jones is that the plan change be accepted. In reaching this conclusion, he has relied upon the advice of Mr Spence.

15 In relation to the concerns raised in the NZTA submission, Mr Spence and myself concur that the overall transportation effects of PC83 upon the operation of the adjacent state

highway will be minimal. We also agree that, since Kiwipoint is the most conveniently located quarry for Wellington, the expected effect of declining PC83 would be an overall increase in truck haulage activity.

- 16 Based upon this advice, Mr Jones has not proposed any amendments to the plan change in relation to the effects on the state highway.¹

CLOSURE

- 17 In my view, the concerns raised by the NZTA with regard to the potential effects of continued quarry truck activity on the Ngauranga Gorge are unfounded. Indeed, potential adverse effects upon the efficient and safe operation of the regional state highway network would be likely to be associated with the closure of the Kiwipoint quarry if the proposed plan change was to be declined.

- 18 On the basis of the traffic issues which I have addressed, I recommend that PC83 be approved.

Tim Kelly

November 2018

ATTACHMENT 1

Wellington City District Plan, Proposed Plan Change 83. Kiwipoint Quarry, Traffic Assessment.

Tim Kelly Transportation Planning Ltd., August 2018.

¹ *paragraph 4.101*